

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

APPLICATION AND AFFIDAVIT OF THE)	
UNITED STATES OF AMERICA FOR A)	
SEARCH WARRANT AUTHORIZING THE)	
OPENING OF UNITED STATES PRIORITY)	Magistrate No. 21-611
MAIL PARCEL 9505 5104 0287 1074 4326 67)	[UNDER SEAL]
AND AN ORDER AUTHORIZING THE)	
INSTALLATION AND MONITORING OF AN)	
ELECTRONIC ALERTING AND GPS)	
TRACKING DEVICES AS PHYSICAL)	
SURVEILLANCE AIDS)	

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Steven J. Celletti, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since April 2004. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Pittsburgh, Pennsylvania field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violation of 18 U.S.C. §§ 1956 and 1957 (money laundering).

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on multiple occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current assignment involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that US Mail is commonly used to transport drugs and drug proceeds because of its reliability and the time pressures it places on law enforcement agents to execute a successful controlled delivery.

4. This affidavit is made in support of an application under Rule 41 of the Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy) and of Title 18, United States Code, Section 1716 (mailing injurious material) from the United States Priority Mail parcel bearing United States Postal Service ("USPS") tracking number 9505 5104 0287 1074 4326 67 (hereinafter "Subject Parcel").

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose

of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On March 18, 2021, Postal Inspection Service interdiction personnel in Pittsburgh, PA interdicted the Priority Mail parcel bearing USPS tracking number 9505 5104 0287 1074 4326 67 (“Subject Parcel”), addressed to “LISA HERSEH, 1514 HATTERAS ST., PITTSBURGH, PA 15212”, with a return address of “IVET GONZALES, CALLE HIPOLAYS #910, COUNTRY CLUB, S.J 00924”. Due to the parcel matching certain characteristics of the established drug profile, as discussed below, the parcel was pulled from the mail stream for further investigation. The Subject Parcel is a USPS Large Flat Rate box measuring 12 1/4” x 12 1/4” x 6” weighing approximately 6 pounds 1.5 ounces and bearing \$21.90 in US Postage. (A photo of the Priority Mail parcel bearing USPS tracking number 9505 5104 0287 1074 4326 67 is attached as Exhibit 1.)

7. Through experience gained in drug investigations by Postal Inspectors and other law enforcement agents, and through information provided by individuals who have been involved in buying, selling, and shipping drugs by US Mail, the Postal Inspection Service has established a drug profile consisting of characteristics frequently shared by packages containing controlled substances mailed through the United States Postal Service. The Pittsburgh office of the Postal Inspection Service utilizes this profile to screen US First Class Mail, Priority Mail and Priority Mail Express packages received at the P & DC, and to review Priority Mail Express labels retained by the USPS.

8. Among the characteristics of the drug profile possessed by the package that is the subject of this search warrant affidavit is the “source state” origination of the package. Postal

Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified Puerto Rico as a source territory for illegal drugs flowing into Pennsylvania.

9. On March 18, 2021, electronic inquiries of the CLEAR database were made for the purpose of confirming the validity of the return name and address contained on the Subject Parcel. The CLEAR inquiry confirmed that CALLE HIPOLAYS #910, COUNTRY CLUB, SAN JUAN, PUERTO RICO is a valid address in the 00924 zip code, there is no IVET GONZALES associated with the address.

10. On March 18, 2021, electronic inquiries of the CLEAR database were made for the purpose of confirming the validity of the recipient's name and address contained on Subject Parcel. The CLEAR inquiry confirmed 1514 HATTERAS ST., PITTSBURGH, PA is a valid address in the 15212 zip code, there is no LISA HERSEH or any individual with the last name of HERSEH associated with the address. CLEAR has proven to be reliable in previous investigations in determining the validity of names and addresses.

11. Through my experience, I know that drug shippers will often list a false or non-existent return address, or use a valid return address with a false sender's name or no name, to reduce the possibility of apprehension by law enforcement. Although a valid recipient's address is necessary to permit the delivery of such packages, a false recipient's name is often used, for the same reason. Also, it is not uncommon for shippers to transpose numbers in the recipient's address.

EXAMINATION BY DRUG CANINE

12. Because the Subject Parcel was found to possess some of the characteristics of the drug profile, the Subject Parcel was subjected to examination by drug canine "Larry".

13. Larry, a dog trained to detect controlled substances, along with his handler Ohio Township Police Officer E. Wallace, was requested to conduct the narcotics search. Larry is certified as a drug detection dog for marijuana, cocaine, heroin, and methamphetamine. Officer Wallace informed me Larry has been used in numerous police searches and in training exercises, and has shown a high proficiency in locating hidden drugs. (Officer Wallace's and Larry's qualifications are attached hereto as Exhibit 2.)

14. On March 18, 2021, Larry examined the Subject Parcel. According to Officer Wallace, Larry did positively alert to the parcel indicating the odor of narcotics.

15. Later today, the search warrant which is being requested herein will be executed on the Subject Parcel. If controlled substances are found inside, as confirmed by a field test, Postal Inspectors will conduct a controlled delivery of the parcel.

16. Based upon my training, experience, and expertise as a Postal Inspector, I submit there is probable cause to search the Subject Parcel for controlled substances and other evidence of violations of Title 21, United States Code, Sections 841(a) (1), 843(b), and 846, and Title 18, United States Code, Section 1716.

ANTICIPATORY ORDER

17. If controlled substances are found inside the Subject Parcel, I am also requesting authorization under Rule 41 of the Federal Rules of Criminal Procedure for the installation and monitoring of an electronic alerting and a tracking device to aid the officers in knowing where and when the suspect(s) open the Subject Parcel to examine or remove the controlled substances. The alerting device will alert law enforcement when the Subject Parcel is opened. The tracking device will facilitate physical surveillance of the parcel.

18. The presence of controlled substances in the Subject Parcel will provide further probable cause to find the sender and intended recipient(s) are committing violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy), as well as violations of Title 18, United States Code, Section 1716 (mailing injurious materials). In addition, the presence of a controlled substance in the parcel will provide probable cause to find that the alerting device will lead to evidence of the aforementioned crimes, as well as to the identification of individuals who are engaged in the commission of said crimes. This will also allow your Affiant and other agents to arrest the suspect(s) as soon as the suspect(s) open the parcel.

19. This application is an anticipatory request. If controlled substances are not found inside the parcel, there will be no need to place an electronic alerting or tracking device or inside the parcel, and no such monitoring will occur.

20. The above information is true and correct to the best of my knowledge, information and belief.

/s/ Steven J. Celletti

STEVEN J. CELLETTI

U.S. Postal Inspector

U.S. Postal Inspection Service

Sworn and subscribed to me, by telephone
Pursuant to Fed. R. Crim. P. 4.1(b)(2)(A),
this 18th day March, 2021

HONORABLE LISA PUPO LENIHAN
United States Magistrate Judge



UNITED STATES
POSTAL SERVICE®

PRIORITY®
MAIL



Retail

P

US POSTAGE PAID

\$21.90

Origin: 00924
03/15/21
4284760019-10

PRIORITY MAIL 3-DAY®

6 Lb 1.50 Oz
1004

EXPECTED DELIVERY DAY: 03/19/21

C046

SHIP
TO:

1514 HATTERAS ST
Pittsburgh PA 15212-4315

USPS TRACKING® #



9505 5104 0287 1074 4326 67

FROM: Ivet Gonzales
Calle, Hipolays #910
Country Club, S.J. P.R.
00924

TO: Lisa Herseh
1514 Hatteras st.
Pittsburgh, P.A 15212

LARGE FLAT RATE BOX
FOR DOMESTIC AND INTERNATIONAL USE

To schedule free
Package Pickup,
scan the QR code.

American Working Dog Association

This is to Certify that

Eric Wallace & K-9 Larry

Have met the high standards set forth by, and to the satisfaction of, the American Working Dog Association. This certification is only valid when this K9 team is being utilized by a private detection or a law enforcement organization.

Let it be known on

September 25, 2020

This Team was certified for

Patrol/Tracking/Narcotics Detection

Certification Good for One Year after Testing

J. Brown, R. Applebault, D. Glaty

Certifier

David Olson

President

Certifying K-9 with Prize